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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

RICHARD ABONDOLO, as Chairman of the Board of: Trustees of UFCW LOCAL 342 HEALTH CARE FUND; and RICHARD ABONDOLO, as Chairman of the Board of: Trustees of UFCW LOCAL 342 SAFETY, EDUCATION. CULTURAL AND LEGAL FUNDS.

Petitioners.

-against-

COURTESY FOOD, INC. d/b/a MET FOOD a/k/a COURTESY FOOD CORP.,

Respondent.

Case No.<u>07-cv-7800(WHP)(RLE)</u> ECF CASE

WRITTEN REPORT FOR PROPOSED DISCOVERY SCHEDULE

Pursuant to the Order of the Honorable William H. Pauley III dated October 1, 2007, counsel for all parties have consulted and the following is a written report for a proposed discovery schedule.

- 1. Joinder of additional parties By 1/21/08
- 2. Amend Pleadings By 1/21/08
- 3. Document Demands & Rog Demands Serve by 1/21/08
- 4. Responses to Discovery Demands By 2/21/08
- 5. Expert Disclosures By 3/21/08
- 6. Opposition Experts By 4/21/08
- 7. Depositions of fact witnesses By 4/21/08
- 8. Depositions of experts By 5/21/08
- 9. Request to admit By 3/21/08
- 10. All Discovery completed by -5/21/08

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11. Any dispositive/post discovery summary judgment motions to be filed by 6/21/08; opposition due by 7/12/08; reply due by 7/26/08

ANDREW JOHN CALCAGNO CALCAGNO & ASSOCIATES ATTORNEYS AT LAW

Attorney for the Petitioners

Date: 12 /14/07

HEATHER BOSHAK FOX ROTHSCHILD, LLP

Attorney for the Respondent

Date: 12.14.67